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HGM Discussion

Discussed the HGM that was developed by consultants for UMI. Wetlands scored very high, .9, and the functional result after mining would be a .56. But we can't tell what this actually means because we need the data sheets to determine what they based the functions on.

Do we need to calibrate the HGM for Indiana? Talked to Bill Ainslie and he doesn't think it needs to, although it could be updated, it probably doesn't need to be because it won't result in an overall functional change. It would also take a long time and they would probably get the same answer.

For mitigation, need details on the function. It doesn't state what they are going to do to achieve the functions on mitigation.

Brought up High Point as the LEDPA; Peabody has the SMCRA permit, they have the 404 application in, it has similar tonnage of coal and we don't have the same level of environmental concern with High Point as we do with 7 Hills.

Corps HQ is not as involved and as far as we know that the Corps is going forward, at least to this point, is that an EIS is required.

Tim: reaction to HGM, seemed like a reasonable application, the functions they were considering and the results of their report; would need to be updated with boundaries of the project and the acreage of the area they were evaluating. Seems like housecleaning need to compare the correct functions in the type of wetlands. No reason to believe that we need to look at different sites.

Using it for mitigation as in Greg's email, it would be best to have this discussed by an interagency team so we don't get into a back and forth with the company.

Company concerned that we keep asking for more information and there is no end to what we are asking for. We have been very clear on what they need to do to comply with the guidelines. Clay asked will our issues been resolved if they use the HGM. The HGM is just a tool so it's a starting point to assess conditions, impacts and then mitigation.

Can we say that the HGM would be the start of us removing our "b" letter. I said that this is a tool and nothing more. I could get us the information to begin determining whether or not our issues are resolved.